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3 Department of Industrial Relations
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

JULIE SU, California State Labor
Commissioner, Division of Labor
Standards Enforcement, Department of
Industrial Relations, State of California, on
behalf of the People of the State of
California,

Plaintiff,

v.

AEROTEK, INC., a Foreign Corporation;
and DOES 1 to 10, Inclusive,

Defendants.

Case No. 3:15-cv-00428-JSW

**JOINT STIPULATION AND REQUEST TO
CONTINUE STATUS CONFERENCE
AND ORDER THEREON AS MODIFIED**
Conference Date: May 20, 2015
Time: 11:00 a.m.
Ctrm: 5, 2nd Floor, Oakland

1 The parties to the above-entitled action jointly submit this JOINT STIPULATION AND
 2 REQUEST TO CONTINUE THE STATUS CONFERENCE currently scheduled for May 20, 2016,
 3 to June 10, 2016, for good cause as set forth below:

4 The parties reached agreement on a mediator's proposal at their March 3, 2016 mediation.
 5 Counsel for Plaintiff has had difficulty communicating about finalizing the settlement agreement
 6 with real party-in-interest Dr. Ragui Michael, whose interests Plaintiff represents in this case.
 7 Plaintiff filed, and has control over, the action, which was brought on behalf of Dr. Michael.
 8 However, it is necessary to have Dr. Michael as a party to the settlement agreement because he was
 9 the alleged victim of unlawful retaliation.

10 The difficulty in communication between Plaintiff and Dr. Michael is in large part because
 11 Dr. Michael has been abroad for the past seven weeks, and is still there. There have also been
 12 disputes between Plaintiff and Dr. Michael about legal aspects of the settlement agreement not
 13 specified in the mediator's proposal agreed to by the parties, in particular about the proper tax
 14 treatment of the settlement amount. As of today, May 26, 2016, the parties appear to be close to
 15 resolving the outstanding issues and are confident that the issues will be resolved and a dismissal can
 16 be on file before June 10, 2016.

17 As a result, the parties hereby jointly stipulate and request that the Status Conference
 18 currently scheduled for May 27 at 11:00 a.m. be continued for two weeks, until June 10, 2016, at
 19 11:00 a.m.

20
 21 Dated: May 20, 2016

/s/ Matthew A. Goodin
 22 MATTHEW A. GOODIN
 23 EPSTEIN BECKER & GREEN, P.C.
 Attorneys for Defendant
 AEROTEK, INC.

24
 25 Dated: May 20, 2016

/s/ Michael Smith
 26 MICHAEL L. SMITH
 27 Division of Labor Standards Enforcement
 28 Attorneys for Plaintiff

1 I, the filer of this document, attest that all other signatories listed, and on whose behalf the
2 filing is submitted, concur in the filing's content and have authorized the filing.

3 Dated: May 20, 2016

/s/ Matthew A. Goodin
MATTHEW A. GOODIN

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6 **ORDER CONTINUING STATUS CONFERENCE**

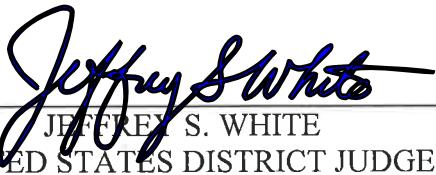
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8 The above JOINT STIPULATION AND REQUEST TO CONTINUE THE STATUS
9 CONFERENCE is hereby GRANTED. The Status Conference currently scheduled for May 27 at
10 11:00 a.m. is hereby VACATED. The parties shall appear in person through lead counsel for a
11 Status Conference on June 10, 2016, at 11:00 a.m.

12 Further requests for continuance of the status conference shall be disfavored.

13 **IT IS SO ORDERED.**

14 Dated: May 26, 2016

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16 JEFFREY S. WHITE
17 UNITED STATES DISTRICT JUDGE

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